

ATTACHMENT C
SPECIFIC COMMENTS ON THE
PRESIDIO TRUST IMPLEMENTATION PLAN (PTIP)
NATIONAL PARK SERVICE
OCTOBER 25, 2001

No.	PTIP Page Reference	Comment
1.	ii	Paragraph 3. "To complement the diverse tenants on the site, the PTIP allows for one or more museums located at a site (or sites) to be determined, possibly occupying or replacing an existing large structure". A list of existing large structures at the Presidio that are candidates for this use should included as well as a map of the areas of development which are suited for the construction of a museum.
2.	vi	Figure I, Planning Districts, Existing Areas of Development and Proposed Open Space should be revised to correctly show existing areas of development. <ul style="list-style-type: none"> Certain existing areas of development are proposed for conversion to open space but the map does not show that conversion. It would be helpful if that information was presented on two maps or the area of overlap shown as hatched with both colors designating the shift from current area of development to future open space. (For example, Wherry Housing is an existing area of development that will become open space.) There are several errors in the designation of areas of development. For example, the area south of the stables is currently not developed but is depicted as such in Figure I. Additional errors are found north of the PSHS, in the drainage at Infantry Terrace, several areas in Fort Scott, and East Housing/Tennessee Hollow.
3.	vii	Paragraph 7. South Hills. "This change would allow restoration of natural resources with enhancement of visitor access and recreational opportunities." Define recreational opportunities and the relationship to restoration of natural resources.
4.	vii	Paragraph 6. "Some infill housing may be integrated." Explain the meaning of 'infill' in this context.
5.	viii	Paragraph 2. The discussion of programs should refer to the Presidio Interpretive Plan being developed in cooperation with the NPS.
6.	x	Paragraph 1. Clarify at what point the requirement for a public process would be triggered if a historic structure to be rehabilitated also required a newly constructed addition (i.e. percentage increase in the building footprint). An example would be a proposal to add an addition to the Presidio Theater.
7.	xi	Table. Rehabilitation and Leasing. The table and the text throughout the PTIP should acknowledge that certain long-term leasing projects should require a separate NEPA and public review process because long-term leases could have significant effects on traffic, land use, visitor experience, effects on Area A that are not assessed in the PTIP EIS.
8.	xi	Table. Major Projects. The West Crissy Field Rehabilitation and Reuse is listed as a project rather than a Major Planning Effort that would be expected of area-wide planning. West Crissy and East Crissy both require a planning stage prior to implementation actions, including long term leasing.
9.	2	Paragraph 3. Please replace text. The Trust and the NPS met regularly but discussions with the NPS focused on review of the planning principles and the graphics depicting the draft alternatives.
10.	8	Under the Trust Act, "removal and/or replacement of some structures within the Presidio must be considered as a management option in the administration of the Presidio;" It is important that the Trust ensure that future projects conform to the Secretary of the Interior's Standards and preserve the integrity of the NHL. The PTIP lacks sufficient information on how decisions for new construction and demolition will be made. The final PTIP should clarify the decision making process for demolition of historic buildings and for new construction within historic areas.

No.	PTIP Page Reference	Comment
11.	9	Paragraph 3. The Purpose discussion should include a commitment to the preservation of the NHL status and to the value of the Presidio as a national park.
12.	9	Paragraph 1: "PTIP retains elements of the GMPA that have already been carried out or do not warrant change." Specify what these elements are.
13.	13	General Objectives of the GMPA - " The Trust Act directs the Presidio Trust to manage the property under its jurisdiction in accordance with (1) the purposes of the Act establishing the GGNRA, and (2) the "General Objectives" of the GMPA. The General Objectives set forth in Presidio Trust Board Resolution 99-11 dated March 4, 1999 are:" The section outlining the Trust Act directives should be corrected to read, "...and (2) the general objectives of the GMPA. ". It should also clarify that the General Objectives adopted by the Presidio Trust Board Resolution 99-11 are a summary of the GMPA and are not drawn verbatim from it.
14.	14	Paragraph 4. Areas in Fort Scott, Crissy Field, Main Post and Letterman where new construction could be sited should be identified.
15.	14	Paragraph 1. The discussion of Trust programs should make reference to the NPS and the Trust roles assigned by the Trust Act.
16.	21	Paragraph 1: "The Presidio Trust would lead stewardship efforts to preserve the Presidio's uniqueness by preserving and enhancing its diverse and rich natural resources." Change "lead" to "collaborate on". NPS is already stewarding natural and historic areas throughout both Areas A and B of the Presidio. Duplication of stewardship efforts should be actively avoided.
17.	21 22	Principle 1: restoration of natural processes and functions is qualified by notation in two places that restoration efforts would be accomplished "where feasible". Clarify the constraints that support this statement.
18.	22 23 26 28	Resource Maps: <ul style="list-style-type: none"> • The Trust should identify any areas of the adopted VMP map that are proposed for amendment under the PTIP. • Include a map of areas of existing plant and wildlife values, future restoration sites, and corridor linkages with expository text to support the planning principle to protect and enhance plant and wildlife habitat and enhancing wildlife corridors. • Page 26, Paragraph 5. Include a map of wetland features to support the commitment of no loss of existing wetland features. • Page 28, Paragraph 5. Include a map of the historic structures that are being considered for demolition.
19.	25	Principle 3 should protect all native geologic and soil resources at the Presidio, not just those associated with ecosystems.
20.	25	Paragraph 3. This paragraph describing projects for water resources should be updated to describe the Crissy Marsh Alternatives Assessment.
21.	25	Paragraph 5. A subheading for the Crissy Marsh should be added before Creeks and Drainages, describing principles for protecting and expanding Crissy Marsh to support the goal of sustainability through natural processes.
22.	25	Paragraph 6. The principles for Tennessee Hollow and Crissy Marsh connectivity should address objectives for the Doyle Drive planning process.
23.	26	Paragraph 5. The PTIP should link Mountain Lake restoration with the principles stated in prior pages (e.g., pages 23 "maintaining wildlife corridors") and lay out the watershed scale protection/restoration actions that would make the Mountain Lake restoration project sustainable. These include protection of water quality from Park Presidio Blvd. (cooperative effort with Caltrans) and golf course runoff/infiltration, possible expansion of natural area into golf course and east arm, and long-range corridor planning (e.g., linking with Lobos Creek riparian area).
24.	26 177	Paragraph 2 and 8 respectively. The Water Quality and Water Conservation discussion (p. 56) should address protection of the water quality in the Lobos Creek watershed. The principles should support surface and groundwater quality protection of the watershed that includes the most innovative integrated pest management and fertilizing practices for the golf course.

No.	PTIP Page Reference	Comment
25.	26	Since the enhancement plan for Mountain Lake focuses within the footprint of the lake, it would be appropriate to use PTIP to lay out the watershed scale protection/restoration actions that would make the Mountain Lake restoration project sustainable. These include protection of water quality from Park Presidio Boulevard (cooperative effort with Caltrans), golf course runoff/infiltration, possible expansion of habitat restoration into an adjacent section of the golf course and the east arm of Mountain Lake, and long-range corridor planning (e.g., linking with Lobos Creek riparian area). In addition, linking Mountain Lake restoration with the principles stated in prior pages (e.g., pages 23 “maintaining wildlife corridors”) appears appropriate as well.
26.	27	Paragraph 3. The PTIP should explicitly outline the approval process for the new construction in historic areas.
27.	27 28	Paragraphs 2 and 4 respectively. The PTIP should clearly state what guidance will be provided to ensure that the landscaping around the historic buildings is clearly researched and understood. PTIP should clearly state that landscape development around historic structures will be a part of the project development process and should also be consistent with the VMP.
28.	28	Paragraph 5. In addition to discussion of the Trust Act and the HABS 1985 Survey, the PTIP should state that the more recent survey, the 1992 NHL update, will be used in place the HABS 1985 survey as the basis for impact assessment and with for PTIP and NHPA compliance.
29.	28	Paragraph 4. “Through future planning process... the Presidio Trust would evaluate historic buildings for retention or demolition.” This section should include an explanation of the future planning process through the NHPA and NEPA and opportunity for public/agency review.
30.	29	Paragraph 6. Explain in the text the relevant sections of the NHPA and the Trust’s NHPA responsibilities.
31.	29	Paragraph 1. “The Trust would ensure a full public review and participation program in any proposed projects with the potential for adversely affecting historic resources.” Clarify that this is a legal requirement under the NHPA.
32.	29	Paragraph 4. The Trust must comply with Section 110, which addresses reuse of historic structures by federal agencies, as well as Section 106.
33.	29	Paragraph 3. “...the Trust may demolish several smaller buildings in order to aggregate square footage to build or expand larger buildings.” Clarify how this proposal conforms to the Trust Act language requiring that “new construction is limited to replacement of existing structures of similar size.” The text should clarify that the construction of substantially larger buildings may have an adverse effect upon the character of the NHL and would require NHPA conformance.
34.	31	Paragraph 1. Change the reference “Secretary of the Interior’s Standards for museum collections” to the “Department of Interior’s Property Management Regulations” (IPMR) (410 Departmental Manual 115-60), and Departmental Manual Part 411 “Museum Property Management” Chapters 1 – 3, based upon the NPS Museum Handbook, Parts I, II, III). This manual is for DOI bureaus.
35.	32	Paragraph 2. Replace the statement, “The Presidio Trust in cooperation with the NPS is creating a Scope of Collections document...” with the following “GGNRA has a current Scope of Collection Statement (SOCS) which has been submitted to the Presidio Trust.” Currently, the NPS acquires, catalogs, and displays the collections. Please clarify whether the Trust plans to establish its own collection and collecting policy.
36.	32	Paragraph 3. Correct the text to indicate that 36 CFR Part 79 can only direct the collection of federal archaeological materials and does not address the broad variety of museum objects, specimens, and collections that make up the museum collections.
37.	32	Paragraph 4. Change the reference to the “Secretary of Interior’s Standards for Curation” to the “Interior Property Management Regulations (IPMR) (410 Departmental Manual 115-60) Departmental Manual Part 411 “Museum Property Management,” Chapters 1 – 3. Also, correct the text as follows: “Significant material discovered during construction and excavation work will be accessioned and cataloged into the GOGA collection.”
38.	32	Paragraph 5. The NPS recommends that the Trust not make the checklist that evaluates conditions of its museum collections public as it includes important information about security.

No.	PTIP Page Reference	Comment
39.	33	Principle 9, Open Space Expansion, should address the recreational uses of open space only and show compatibility with ecosystem and wildlife values. The NPS supports the Trust commitment to expand open space but the quality of the open space should be defined by broad type to distinguish native plant community from landscaped open space (i.e. athletic fields, golf course). The PTIP should locate the proposed expansions of open space by these broad category types and explain their contribution to the park values.
40.	33	Paragraph 3. Add a category of “recreational areas” to clarify the intended land use patterns. There is confusion between the definition of “open space” which does not include “landscaping” as used in PTIP, and the proposal to use VMP categories, including “landscaped areas” as a management tool. In particular, the inclusion of the golf course in this definition, which is an intensively managed landscape, contrasts markedly with the other land uses described (natural habitat, forest, wetlands, etc.)
41.	35 36	Paragraph 6 and Paragraph 2, respectively: Protection and restoration of air quality, natural lightscape, odorscape and soundscape should apply to the entire Presidio and not just to “open space”.
42.	37	Paragraph 2. The development of new ball fields, or group camping areas should be assessed on a Presidio-wide basis.
43.	46	Add to overall transportation goals for PTIP: <ul style="list-style-type: none"> • Trust should give serious consideration to one way routes such as vehicle loops for traffic moving through and around the Presidio. • Cars should be confined to main routes with spur routes to minor locations such as parking areas. • The many roads on the Presidio should not all be available to cars; many should be closed to auto use permanently. • Weekend closures of low volume roads should be established. • Tenants need to include trail planning as part of their overall development, an example being the trail connection to the Exploratorium.
44.	46	Principle 17. Multi-Modal Transportation Options. Include car pools and van pools in transportation options. Include a complete list and clarification of transportation goals.
45.	46	Paragraph 6. Traffic Management. Setting speed limits arbitrarily low will cause consistent enforcement and legal issues. Discuss control of speed through roadway design instead.
46.	47	Paragraph 4. Broaden discussion of TDM goals to include impacts on GGNRA, Presidio Trust and City of San Francisco if these goals are not met.
47.	52	Paragraph 4. Enlarge the discussion on limiting parking either by location or overall supply to include a proposed timetable of how, when and where these changes will be implemented.
48.	56	Paragraph 3. Revise section on “Sources of Reclaimed Water”. It describes sources of water and potential uses of reclaimed water, not sources of reclaimed water. Include Crissy Field (Area A) as a potential user of reclaimed water for irrigation.
49.	56	Paragraph 2. Include a conservation implementation plan (including water conservation goals), timeline for action, and a yardstick for assessing progress in attaining water use and conservation goals.
50.	58 59	Principle 25. Environmental Remediation: Include appropriate erosion control and revegetation treatments, consistent with the Vegetation Management Plan, as integral components of any remediation activity.
51.	65	Paragraph 4. The PTIP should include a commitment to continuing sites and buildings that host Presidio NPS interpretive and stewardship programs into the future.
52.	66	Paragraph 2. Give the current status of the PIP and the relationship of the PIP to the Interpretive Themes in the PTIP.
53.	68	Paragraph 6. Clarify if the described Bay Area Museum and Resource Center is different from the proposal for a collections facility. Delete the word “additional”.
54.	68	Paragraph 2. A focus for the educational partnership or institute for Fort Scott should be added, with a description of the goals of the institute.

No.	PTIP Page Reference	Comment
55.	68	Paragraph 1. Describe the process that will decide which museums or institutions will offer a “uniquely western perspective on the American experience”.
56.	73	Paragraph 2. The Nursery should be an operating cost rather than a park program.
57.	74	Table 3.1: <ul style="list-style-type: none"> Table should also estimate the income generated and referred to in the text of this same page for programs such as the teleconferencing center, traveling exhibits, special event rentals and restaurants. The figure mentioned for the “Park Museum Management and Collections Fund” is the estimate for the rehabilitation of the Commissary (PE-0610) and Machine Shop (PE-0924). An annual operating figure should be added to the base funding list. The Nursery should be an operating cost rather than a park program Clarify why the Trust would assume funding of major museums at \$25 to \$45 million each when this is not part of the essential Trust mandate.
58.	74	Table 3.1. Clarify the assumption that the Fort Scott Institute would be funded by the Trust.
59.	77	The need for wildlife habitat corridors that span the Presidio should be addressed in the context of Planning Districts.
	98 99	Guidelines. Identify habitat corridors in guidelines, particularly through Tennessee Hollow and on the northern bluffs.
60.	78	Paragraph 2. “Housing would not be removed until and unless replacement housing is provided via conversion of existing buildings or new construction in other areas of the park.” The PTIP should frame this as a firm commitment to not construct replacement housing until existing housing is removed, to avoid the potential to forego removal.
61.	81	Table 4.1. Letterman planning area should identify residential as a use.
62.	81	Table 4.1 should show the demolition and total new construction as well. The text should clarify whether demolition or construction square footage foregone in one district can be transferred to another.
63.	83	Paragraph 1. Main Post – Identify which structures could be available for the park visitor and community related activities around the parade ground. Include a discussion of limitation on office use if leasing proceeded planning.
64.	84	Paragraph 1. Main Post. Include description of which non-historic and HABS structures could be removed.
65.	84	Paragraph 1. The quote from page 58 of the GMPA has been improperly altered from the original text. Deleted without notation from the end of the third sentence is: “...directed at increasing understanding of diverse cultures, and facilitating peaceful dispute resolution.” The final sentence of the quote is from page 59, not 58, of the GMPA.
66.	84 85	Paragraph 6. The quote from page 61 of the GMPA has been altered from the original text. Deleted without notation from the first sentence is the word “interior”. The corrected quote should read: Much of the interior space at the Main Post will be devoted to activities that involve the visiting public.”
67.	85	Paragraph 2. The quote from page 60 of the GMPA should indicate by three dots that two intervening sentences, describing a restored residence and living history experience on Funston Avenue, were left out of the text.
68.	87	Figure 4.4: <ul style="list-style-type: none"> The graphic should show which historic buildings could potentially be demolished. The text should discuss the disposition of Building #34. Figure 1 (page vi) should be corrected to conform to Figure 4-4 at the riparian area north of Infantry Terrace. This area is shown on Figure 1 as an area of existing development. The graphic legend of 4-4 does not include the VMP mapping designations. Neither the text nor the graphic explains the proposed zoning or land use for green area extending north from the post office to Mason Street. The graphic should indicate the area of the northern Main Post, near Crissy Field, where the transit hub could be established.

No.	PTIP Page Reference	Comment
		<ul style="list-style-type: none"> • The sliver of the forest just northwest of Infantry Terrace should be included in the South Hills planning area instead of the Main Post. • The area east of the Halleck Street warehouses should be changed from an area of development to one of the vegetated zonings. This area is currently not developed, has no vehicle access and could be included into the Tennessee Hollow Riparian Corridor. • Clarify the vegetation type within the Infantry Terrace loop.
69.	87	Paragraph 2. Confirm in the FEIS whether underground parking is part of the PTIP. If it is not, adequate parking for the uses proposed needs to be estimated and locations identified.
70.	87 102	Figure 4.4 and Figure 4.8 respectively. Tennessee Hollow, now shown within four planning districts should be designated as its own resource-based planning district.
71.	91	<p>Paragraph 1. The PTIP should specifically address and identify historic streets and their associated features to assure that the development of the transportation network and possible closings does not adversely affect these contributing features in the NHL District.</p> <p>There is discussion of street redundancy in the guidelines, but the historic streets and their associated features have not been identified to understand what the impact of the removal/closure of historic streets would be.</p>
72.	93	Paragraph 3. The text cited from the GMPA should include the last four words of the final sentence so that it reads, "The area's important cultural, natural and recreational resources will be managed to maximize compatibility among uses <u>while ensuring their preservation.</u> "
73.	95	<p>Figure 4.6.</p> <ul style="list-style-type: none"> • Identify the proposed uses for the green area between the PX and the Commissary. • Clarify whether this coloration relates to the possible expansion of Crissy Marsh? • Figure 1 (Page vi) Area of Development should be amended to conform to the zoning in the area south of the stables. • Indicate on Figure 4.6 which buildings are on the HABS 1985 2 through 5 category. • Indicate which areas could be used for lodging. • Clarify the coding of landscape and native plant areas along the slopes of the bluff.
74.	96	Paragraph 2. Identify the planning process that would address the proposed extension of the main post parade ground across Doyle Drive. Clarify where parking would be provided for all the new uses proposed for Crissy Field and how the additional traffic would impact Mason Street. .
75.	98	Paragraph 6. The PTIP process should assume that a district-wide archeological survey would be completed for Crissy Field in time to inform planning for future projects.
76.	99	Paragraph 3. Expand the bullet regarding Doyle Drive guidelines to include the goal of preserving habitat corridors and maintaining hydrologic connectivity.
77.	102	<p>Figure 4-8:</p> <ul style="list-style-type: none"> • Indicate which historic structures are planned for demolition. • Indicate areas intended for residences. • On pages 87 and 102, explain why the planning district boundaries don't conform to existing physical boundaries, i.e. the intersection of Lincoln and Presidio between the Main Post and the Letterman planning districts.
78.	105	Paragraph 3. The Letterman Courtyard parking lot is proposed for restoration. Include in this discussion the need to provide parking for the Letterman Complex and the capacity of the Lucas garage.
79.	107 111	Paragraphs 3 and 2 respectively. The PTIP should add the commitment to the preservation of the historic military landscape features such as the batteries to the Planning Principles and guidelines.

No.	PTIP Page Reference	Comment
		Specifically, Battery Howe-Wagener, Battery Stotsenberg McKinnon, and the batteries facing the bay (Sherwood, Blaney, Baldwin), including the central magazine and radio station, should be used only for interpretation and cultural management. They should not be adaptively redesigned for other uses. New buildings or structures should not be built in their immediate vicinity to protect their site integrity.
80.	109	<p>Figure 4.10:</p> <ul style="list-style-type: none"> At the northwest corner of Fort Scott (just below Doyle Drive), the Area of Development extends into existing wetland features and should be corrected. The aerial photo on page 108 clearly shows this whole section of Fort Scott to be currently vegetated and therefore not a current area of development. Show which of the structures in this district, both historic and non-historic, could potentially be demolished. Since structures in this planning district could be 30 to 45 feet tall, the district map should identify the likely locations for new construction.
81.	111	Paragraph 8. Please specify the potential relocation areas for the ballfields removed from the north end of the parade ground.
82.	113	<p>The Public Health Services Hospital Planning District should be changed so that the boundary includes only the already developed area around the hospital and the streets to the east of the hospital. We support the Trust's identification of the important natural and recreational values of the South Hills Planning District, and suggest that this district be expanded to include the natural areas currently in the Public Health Services Hospital Planning District. This is in keeping with the overall principle within the PTIP planning process to concentrate development in developed areas and to create large contiguous open space areas to promote natural resource values.</p> <p>The proposal to amend the VMP designation in the area proposed as a 'landscape' designated zone at the PHS parking area, and 'Residential / Institutional' zone at the Nike Missile site, would violate the mitigation measures in the PTIP DEIS on restoration of native plant communities (DEIS pg. 257, mitigation NR-5) and protection of wetlands (DEIS pg. 266, mitigation NR-17). In particular, given that the hydrology and plant distribution of the PHS parking area indicate that much if not all of the parking area would support the natural expansion of the existing wetland that surrounds the north and east sides of the parking lot, it would be impossible to maintain an 100' buffer around native plant assemblages and wetlands from "intensive human activities" (NR-5 and NR-17). It should be noted that a 100' buffer is not a particularly large buffer for planning around wetlands, and an even larger buffer could be considered appropriate in a national park setting.</p> <p>NPS recommends that this and all future VMP amendments be assessed for potential impacts Presidio-wide and that removal for native plant community acreage require a minimum of a one-to-one replacement of similar resource value.</p>
83.	115	Figure 4-. 12. The graphic and the text should describe the proposed amendment to the VMP zoning in this planning district.
84.	118	Paragraph 4. Explain the techniques to be used to discourage through traffic from 14 th and 15 th Avenues.
85.	121	Figure 4-. 14. Two different shapes are shown in Figure 4-14 and Figure 4-16 for the Area of Existing Development east of Quarry Road. Clarify which one is being proposed.
86.	123	Paragraph 4. Maximum height of new structures is 25 to 35 feet. Include in this discussion the current height of the existing structures by neighborhood.
87.	124	Paragraph 1, last sentence. Delete "where feasible".
88.	129	Figure 4-. 16. The figure shows areas of future development, not existing development as it is labeled. The figure should be amended to include a joint category to show open space and existing development.
89.	137	Table 5-2. Long-term leasing should not occur concurrent with district planning since that would preclude full consideration by decision makers and the public of the potential uses and resources of an area.

No.	PTIP Page Reference	Comment
90.	139	Paragraph 1. In the PTIP Implementation section there is a discussion about soliciting public comments but there is no mention that the comments will be solicited prior to or during project development, evaluated, responded to, and incorporated where feasible into a project. This section should be explicit in outlining a complete public input and participation process.
91.	140	Paragraph 2. The limit of 5.6 million square feet needs to be maintained as a defining element of the Draft Plan alternative to allow for impact assessment in the EIS.
92.	140	Paragraph 6. Please explain the public process necessary to review the relocation of replacement construction to other developed areas of the Presidio.
93.	145	Paragraph 1. The PTIP should clearly state that both the NPS and the Trust have successfully rehabilitated historic buildings using the tax credit program. There should be a stronger commitment to the use of tax credits throughout the sections on Cultural Resources. Buildings suitable for this possibility should be identified and this information should be in the RFPs/RFQs that would be developed. This is especially important on page 138 (paragraph 1) where the successful projects are listed.
94.	146	Paragraph 2. "In the event of early or sustained financial success, Trust could decide, for example, to reduce rents, to provide subsidies, or to scale back plans for building space and capital projects." Change "could" to "would" to confirm a commitment to minimize future construction if not needed for financial sustainability.
95.	149	Paragraph 4. "The Trust proposes to use parking fees as a way to reduce automobile use and demand for parking in the Presidio." The revenue from parking fees should be added as a revenue item/ assumption to balance parking and alternative transportation development costs.
96.	149	Paragraph 4. Include more detail on the projected parking revenues to demonstrate that TDM program will be feasible.
97.	B3	Paragraph 1. The PTIP states that the removal of the Public Health Service Hospital would not affect the integrity of the NHL. The integrity of the district would be significantly affected by this action. The removal of the Public Health Hospital would be an unmitigatable adverse effect. There have been no official 106 consultations or discussions to support this statement and it should be removed. There should be a stronger commitment to use demolition of historic buildings only as a last resort; this is not a sustainable activity and should be considered only on a case by case basis.
98.	D1	Paragraph 1. Clarify the implementation status of the TDM.
99.	D1	Paragraph 2. Overall Goals. Clarify the current status of the elements of the overall goals. Goals should also be connected to the PTIP Planning Principles or the Community Assurances to show the Trust's commitment.
100.	D1	Paragraph 2. Overall Goals. Remove carpools and vanpools from the goal of limiting percentage of external trips by vehicle.
101.	D2	Paragraph 3. Include company/business subsidized bus passes as a TDM program component.
102.	D1	Paragraph 3. Structure the TDM as a tiered effort, identifying increasingly more intense and proactive levels of TDM effort depending on the level of success in meeting TDM goals. Set incremental targets for each goal throughout the planning horizon and monitor and adjust as needed.
103.	H4	Please remove "Diane Nicholson" from the list of "Preparers and Contributors."